

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ADMIRAL INDEMNITY COMPANY,

Plaintiff,

v.

LAKEVIEW COMMONS TOWNHOMES  
CONDOMINIUM ASSOCIATION and  
IDIL OZER,

Defendants

LAKEVIEW COMMONS TOWNHOMES  
CONDOMINIUM ASSOCIATION

Counter-Plaintiff

v.

ADMIRAL INDEMNITY COMPANY,

Counter-Defendant

LAKEVIEW COMMONS TOWNHOMES  
CONDOMINIUM ASSOCIATION,

Third-Party Plaintiff,

v.

WILLIAM R. BERKLEY, SHADI ALBERT,  
SUSAN CLEMSON and ROBERT BUCHERT  
d/b/a BERKLEY LUXURY GROUP,  
a Berkley Company,

Third-Party Defendants

Case No.: 1:24-cv-04294

**JOINT MOTION TO STAY LITIGATION DEADLINES  
BASED ON SETTLEMENT IN PRINCIPLE**

NOW COME the Parties, Plaintiff/Counter-Defendant Admiral Indemnity Company,  
Defendant/Counter-Plaintiff and Third Party Plaintiff Lakeview Commons Townhomes  
Condominium Association, and Defendant Idil Ozer (collectively the “Parties”), by their

respective counsel, and hereby move this Honorable Court for an Order staying all pending litigation deadlines based on the Parties settlement in principle of the issues presented in this litigation. In support of this Joint Motion, the Parties state as follows:

1. The Parties are pleased to report that they have agreed in principle to a settlement that will resolve all disputes and claims at issue in this litigation.

2. The Parties anticipate filing the appropriate pleading with the Court seeking dismissal of this case in its entirety with prejudice upon completion of the settlement.

3. As the Parties have resolved their disputes, in the interests of avoiding further litigation costs while the Parties work to document and fund the settlement, the Parties jointly request that the Court enter an Order staying the pending litigation deadlines and related activities set by this Court's Orders of November 25, 2024 (See ECF #24) and December 16, 2024 (See ECF #27), including: a stay of the upcoming January 15, 2025 deadline for issuance of discovery (per ECF #27); and a stay of the upcoming January 15, 2025 deadline for the amendment of pleadings, including the addition and joinder of other parties, and the April 15, 2015 deadline for service on all Third Party Defendants (per ECF #24).

4. Based on the report to the Court of the settlement in principle through this filing and the anticipated need for time to document and fund the settlement, the Parties also request that the Court strike the required filing of an updated status report January 22, 2025 on discovery progress and settlement (See ECF #27) and set a new date of February 14, 2025 for the filing of a joint status report regarding settlement status unless the case has been dismissed in its entirety prior to that date.

Wherefore, based on the above, the Parties respectfully and jointly request the entry of an Order staying the pending litigation deadlines and related activities described above, striking the

requirement for an updated joint status report on January 22, 2025, and setting a due date of February 14, 2025 for a joint status report regarding settlement status.

Respectfully submitted by:

<p>By: <u>/s/ Brian M. Reid</u></p> <p>Brian M Reid Litchfield Cavo LLP 303 W. Madison, #300 Chicago, IL 60606 (312) 781-6617 <a href="mailto:reid@litchfieldcavo.com">reid@litchfieldcavo.com</a></p> <p><i>Counsel for Admiral Indemnity Company</i></p>	<p>By: <u>/s/ Kenneth Anspach</u></p> <p>Kenneth Anspach, Esq. Anspach Law Office 77 West Washington Street, Suite 1420 Chicago, Illinois 60602 T: (312) 407-7888 <a href="mailto:ken@anspachlawoffice.com">ken@anspachlawoffice.com</a></p> <p><i>Counsel for Lakeview Commons Townhomes Condominium Association</i></p>
<p>By: <u>/s/ Michael P. Connelly</u></p> <p>Michael P. Connelly Of Counsel Rock Fusco &amp; Connelly LLC 333 W. Wacker, 19<sup>th</sup> Floor Chicago Illinois 60606 T: 312 494 1000 <a href="mailto:mconnelly@rfclaw.com">mconnelly@rfclaw.com</a></p> <p>Mario Palermo PALERMO LAW GROUP, LLC 1415 W. 22nd St., Tower Floor Oak Brook, IL 60523 T: (630) 684-2332 <a href="mailto:mario@palermolawgroup.com">mario@palermolawgroup.com</a></p> <p><i>Counsel for Idil Ozer</i></p>	

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was electronically filed this 14th day of January 2025. Notice will be sent by the Court's electronic filing system to all counsel of record listed on the filing receipt.

/s/ Brian M. Reid